Case: 1:13-cv-01165-CAB Doc #: 78 Filed: 07/29/15 1 of 2. PageID #: 2289

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July 29, 2015

VIA HAND-DELIVERY AND ECF

The Honorable Christopher A. Boyko United States District Judge Carl B. Stokes United States Court House 801 West Superior Avenue Courtroom 15B Cleveland, OH 44113

Re: Government of Guam Retirement Fund v. Invacare Corporation

Case No. 1:13CV1165 (CAB)

Dear Judge Boyko:

We write on behalf of the Lead Plaintiff in the above-captioned class action. On the record during the July 23, 2015 hearing on Lead Plaintiff's Motion for Preliminary Approval of Class Action Settlement (ECF No. 71), the Court preliminarily approved the proposed class action Settlement; approved the form, content and manner of the Class Notices to Settlement Class Members (with amendments); certified the proposed Settlement Class; and scheduled the Final Approval Hearing for November 19, 2015, at 2:00 p.m.

In furtherance of the proceedings, the Court ordered the Parties to submit a Proposed Order Preliminarily Approving Proposed Settlement and Providing for Notice, which incorporates the discussions in Chambers and the findings on the record in open court. The Court also denied as most Lead Plaintiff's Motion for Class Certification (ECF No. 66), subject to re-filing if this class action Settlement is not accomplished.

Pursuant to the Court's order, the Parties have agreed upon the following documents attached hereto as Exhibit A, which incorporate the discussions in Chambers and the findings on the record in open court:

Exhibit: A: [Revised Proposed] Order Preliminarily Approving Proposed Settlement and Providing for Notice

Case: 1:13-cv-01165-CAB Doc #: 78 Filed: 07/29/15 2 of 2. PageID #: 2290

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

Hon. Christopher A. Boyko July 29, 2015 Page 2

Exhibit A-1: Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses ("Class Notice")

Exhibit A-2: Proof of Claim and Release Form

Exhibit A-3: Summary Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses ("Summary Notice")

For the Court's convenience, we have also attached hereto as Exhibit B redline versions of the proposed Order, Class Notice (Exhibit A-1), and Summary Notice (Exhibit A-3), reflecting the changes from the versions of the documents previously attached to the Stipulation (ECF No. 73) and submitted to the Court prior to the July 23, 2015 hearing. No changes have been made to the Proof of Claim and Release Form (Exhibit A-2).

We thank the Court for its attention to this matter.

Respectfully submitted,

BENJAMIN GALDSTON

cc: All Counsel of Record (via ECF) Encl. (4)